

[Submitting Counsel on Signature Page]

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

No. 4:22-md-03047-YGR

MDL No. 3047

This Document Relates To:

*Breathitt County Board of Education v. Meta
Platforms, Inc., et al.*

*Tucson Unified School District v. Meta
Platforms, Inc., et al.*

*Charleston County School District v. Meta
Platforms, Inc., et al.*

*Irvington Public Schools v. Meta Platforms,
Inc., et al.*

*Dekalb County School District v. Meta
Platforms, Inc., et al.*

*Board of Education of Harford County v.
Meta Platforms, Inc., et al.*

**DECLARATION OF MELISSA L. YEATES
IN SUPPORT OF SCHOOL
DISTRICT/LOCAL GOVERNMENT
ENTITY PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION TO EXCLUDE
TESTIMONY OF SCHOOL DISTRICT
EXPERTS**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Date: January 26, 2026

Time: 8:00 AM

Place: Courtroom 1, 4th Floor

1 I, Melissa L. Yeates, of full age and duly sworn according to law, declare:

2 I am an attorney admitted to practice law in Pennsylvania, Delaware, and New York and
3 admitted *pro hac vice* in this Court. I am a Partner with the law firm of Kessler Topaz Meltzer &
4 Check, LLP, and I serve as Co-Chair of the Local Government Entity and School District
5 Subcommittee in the above-captioned litigation. I submit this Declaration in support of the School
6 District Plaintiffs' Opposition to Defendants' Motion to Exclude Testimony of School District
7 Experts, filed concurrently herewith. I have personal knowledge of the facts stated in this
8 Declaration, and if called upon to do so, could and would competently testify thereto.

9 1. Attached as **Exhibit 1** is a true and correct copy of the May 16, 2025 Expert Report
10 of Dimitri Christakis, M.D., M.P.H.

11 2. Attached as **Exhibit 2** is a true and correct copy of the May 16, 2025 Expert Report
12 of Gary Goldfield, Ph.D.

13 3. Attached as **Exhibit 3** is a true and correct copy of the May 16, 2025 Expert Report
14 of Anna Lembke, M.D.

15 4. Attached as **Exhibit 4** is a true and correct copy of the May 16, 2025 Expert Report
16 of Dr. Ramin Mojtabai, M.D., Ph.D., MPH.

17 5. Attached as **Exhibit 5** is a true and correct copy of the May 16, 2025 Expert Report
18 of Eva Telzer, Ph.D.

19 6. Attached as **Exhibit 6** is a true and correct copy of the May 18, 2025 Expert Report
20 of Robert Klein for Breathitt County School District.

21 7. Attached as **Exhibit 7** is a true and correct copy of the May 18, 2025 Expert Report
22 of Robert Klein for Charleston County School District.

23 8. Attached as **Exhibit 8** is a true and correct copy of the May 18, 2025 Expert Report
24 of Robert Klein for DeKalb County School District.

25 9. Attached as **Exhibit 9** is a true and correct copy of the May 18, 2025 Expert Report
26 of Robert Klein for Board of Education of Harford County.

27 10. Attached as **Exhibit 10** is a true and correct copy of the May 18, 2025 Expert Report
28 of Robert Klein for Irvington Public Schools.

11. Attached as **Exhibit 11** is a true and correct copy of the May 18, 2025 Expert Report of Robert Klein for Tucson Unified School District.

12. Attached as **Exhibit 12** is a true and correct copy of the August 1, 2025 Rebuttal Report of Robert Klein for Breathitt County School District.

13. Attached as **Exhibit 13** is a true and correct copy of the August 1, 2025 Rebuttal Report of Robert Klein for Charleston County School District.

14. Attached as **Exhibit 14** is a true and correct copy of the August 1, 2025 Rebuttal Report of Robert Klein for DeKalb County School District.

15. Attached as **Exhibit 15** is a true and correct copy of the August 1, 2025 Rebuttal Report of Robert Klein for Board of Education of Harford County.

16. Attached as **Exhibit 16** is a true and correct copy of the August 1, 2025 Rebuttal Report of Robert Klein for Irvington Public Schools.

17. Attached as **Exhibit 17** is a true and correct copy of the August 1, 2025 Rebuttal Report of Robert Klein for Tucson Unified School District.

18. Attached as **Exhibit 18** is a true and correct copy of the September 5, 2025 deposition transcript of Robert Klein.

19. Attached as **Exhibit 19** is a true and correct copy of the March 21, 2025 warming email for Breathitt County School District, Bates stamped Klein000006.

20. Attached as **Exhibit 20** is a true and correct copy of the April 3, 2025 warming email reminder for Breathitt County School District, Bates stamped Klein000007- Klein000008.

21. Attached as **Exhibit 21** is a true and correct copy of the April 22, 2025 warming email reminder for Breathitt County School District, Bates stamped Klein000009-Klein000010.

22. Attached as **Exhibit 22** is a true and correct copy of the April 7, 2025, April 21, 2025, and April 24, 2025 warming email and warming email reminders for Charleston County School District, Bates stamped Klein0000011-Klein0000013.

23. Attached as **Exhibit 23** is a true and correct copy of the April 3, 2025 warming email for DeKalb County School District, Bates stamped Klein000014.

24. Attached as **Exhibit 24** is a true and correct copy of the April 14, 2025 warming email reminder for DeKalb County School District, Bates stamped Klein000015- Klein000016.

25. Attached as **Exhibit 25** is a true and correct copy of the April 23, 2025 warming email reminder for DeKalb County School District, Bates stamped Klein000017-Klein000018.

26. Attached as **Exhibit 26** is a true and correct copy of the warming email for Board of Education of Harford County, Bates stamped Klein000019.

27. Attached as **Exhibit 27** is a true and correct copy of the March 27, 2025 warming email for Irvington Public Schools, Bates stamped Klein000020- Klein000021.

28. Attached as **Exhibit 28** is a true and correct copy of the April 4, 2025 warming email reminder for Irvington Public Schools, Bates stamped Klein000022- Klein000024.

29. Attached as **Exhibit 29** is a true and correct copy of the April 1, 2025 warming email for Tucson Unified School District, Bates stamped Klein000025.

30. Attached as **Exhibit 30** is a true and correct copy of the April 22, 2025 warming email reminder for Tucson Unified School District, Bates stamped Klein000026.

31. Attached as **Exhibit 31** is a true and correct copy of the article *Gender Differences in Careers, Education, and Games* (2008), authored by Claudia Goldin and Lawrence F. Katz.

32. Attached as **Exhibit 32** is a true and correct copy of the article *Virtual Rituals: Community, Emotion, and Ritual in Massive Multiplayer Online Role-playing Games—A Quantitative Test and Extension of Structural Ritualization Theory* (2018), authored by Joseph M. Simpson, J. D. Knottnerus, and Michael J. Stern.

33. Attached as **Exhibit 33** is a true and correct copy of the September 2, 2025 Second Amended Expert Report of Dr. Bryce Ward for Breathitt County Schools.

34. Attached as **Exhibit 34** is a true and correct copy of the September 2, 2025 Second Amended Expert Report of Dr. Bryce Ward for Charleston County School District.

35. Attached as **Exhibit 35** is a true and correct copy of the August 8, 2025 Amended Expert Report of Dr. Bryce Ward for DeKalb County School District.

36. Attached as **Exhibit 36** is a true and correct copy of the August 8, 2025 Amended Expert Report of Dr. Bryce Ward for Harford County Public Schools.

1 37. Attached as **Exhibit 37** is a true and correct copy of the May 31, 2025 Amended
2 Expert Report of Dr. Bryce Ward for Irvington Public Schools.

3 38. Attached as **Exhibit 38** is a true and correct copy of the May 19, 2025 Expert Report
4 of Dr. Bryce Ward for Tucson Unified School District.

5 39. Attached as **Exhibit 39** is a true and correct copy of the July 31, 2025 Expert Reply
6 Report of Dr. Bryce Ward for Breathitt County Schools.

7 40. Attached as **Exhibit 40** is a true and correct copy of the July 31, 2025 Expert Reply
8 Report of Dr. Bryce Ward for Charleston County School District.

9 41. Attached as **Exhibit 41** is a true and correct copy of the July 31, 2025 Expert Reply
10 Report of Dr. Bryce Ward for DeKalb County School District.

11 42. Attached as **Exhibit 42** is a true and correct copy of the July 31, 2025 Expert Reply
12 Report of Dr. Bryce Ward for Harford County Public Schools.

13 43. Attached as **Exhibit 43** is a true and correct copy of the July 31, 2025 Expert Reply
14 Report of Dr. Bryce Ward for Irvington Public Schools.

15 44. Attached as **Exhibit 44** is a true and correct copy of the July 31, 2025 Expert Reply
16 Report of Dr. Bryce Ward for Tucson Unified School District.

17 45. Attached as **Exhibit 45** is a true and correct copy of the August 15, 2025 deposition
18 transcript of Dr. Bryce Ward.

19 46. Attached as **Exhibit 46** is a true and correct copy of the May 13, 2025 Affidavit of
20 Dr. April Vauss.

21 47. Attached as **Exhibit 47** is a true and correct copy of the May 16, 2025 Affidavit of
22 Sandra Lopez.

23 48. Attached as **Exhibit 48** is a true and correct copy of the May 15, 2025 Affidavit of
24 Will Noble.

25 49. Attached as **Exhibit 49** is a true and correct copy of the May 2, 2025 Affidavit of
26 Daphne Noble.

27 50. Attached as **Exhibit 50** is a true and correct copy of the May 9, 2025 Affidavit of
28 Jeremy Hall.

1 51. Attached as **Exhibit 51** is a true and correct copy of the May 5, 2025 Affidavit of
2 Phillip Watts.

3 52. Attached as **Exhibit 52** is a true and correct copy of the May 9, 2025 Affidavit of
4 Kera Howard.

5 53. Attached as **Exhibit 53** is a true and correct copy of the May 12, 2025 Affidavit of
6 Brian Lambert.

7 54. Attached as **Exhibit 54** is a true and correct copy of the May 13, 2025 Affidavit of
8 Julie Shivanonda.

9 55. Attached as **Exhibit 55** is a true and correct copy of the May 13, 2025 Affidavit of
10 Holly Hammel.

11 56. Attached as **Exhibit 56** is a true and correct copy of the May 13, 2025 Affidavit of
12 Dr. Sabrina Salmon.

13 57. Attached as **Exhibit 57** is a true and correct copy of the May 12, 2025 Affidavit of
14 Anita Huggins.

15 58. Attached as **Exhibit 58** is a true and correct copy of the May 15, 2025 Affidavit of
16 Lisa Kathryn Allison.

17 59. Attached as **Exhibit 59** is a true and correct copy of the May 14, 2025 Affidavit of
18 Daniel Prentice.

19 60. Attached as **Exhibit 60** is a true and correct copy of the May 16, 2025 Affidavit of
20 Monika Davis.

21 61. Attached as **Exhibit 61** is a true and correct copy of the May 7, 2025 30(b)(1)
22 deposition transcript of Bernard Hennigan.

23 62. Attached as **Exhibit 62** is a true and correct copy of the May 8, 2025 30(b)(1)
24 deposition transcript of Donovan Brooks.

25 63. Attached as **Exhibit 63** is a true and correct copy of the May 19, 2025 Expert Report
26 of Jeffrey Meyers for Breathitt County Board of Education.

27 64. Attached as **Exhibit 64** is a true and correct copy of the May 19, 2025 Expert Report
28 of Jeffrey Meyers for Charleston County School District.

65. Attached as **Exhibit 65** is a true and correct copy of the May 19, 2025 Expert Report of Jeffrey Meyers for DeKalb County School District.

66. Attached as **Exhibit 66** is a true and correct copy of the May 19, 2025 Expert Report of Jeffrey Meyers for Board of Education of Harford County.

67. Attached as **Exhibit 67** is a true and correct copy of the May 19, 2025 Expert Report of Jeffrey Meyers for Irvington Public Schools.

68. Attached as **Exhibit 68** is a true and correct copy of the May 19, 2025 Expert Report of Jeffrey Meyers for Tucson Unified School District.

69. Attached as **Exhibit 69** is a true and correct copy of the July 25, 2025 Expert Reply Report of Jeffrey Meyers for Breathitt County Board of Education.

70. Attached as **Exhibit 70** is a true and correct copy of the July 25, 2025 Expert Reply Report of Jeffrey Meyers for Charleston County School District.

71. Attached as **Exhibit 71** is a true and correct copy of the July 25, 2025 Expert Reply Report of Jeffrey Meyers for DeKalb County School District.

72. Attached as **Exhibit 72** is a true and correct copy of the July 25, 2025 Expert Reply Report of Jeffrey Meyers for Board of Education of Harford County.

73. Attached as **Exhibit 73** is a true and correct copy of the July 25, 2025 Expert Reply Report of Jeffrey Meyers for Irvington Public Schools.

74. Attached as **Exhibit 74** is a true and correct copy of the July 25, 2025 Expert Reply Report of Jeffrey Meyers for Tucson Unified School District.

75. Attached as **Exhibit 75** is a true and correct copy of the August 22, 2025 deposition transcript of Jeffrey Meyers.

76. Attached as **Exhibit 76** is a true and correct copy of Plaintiff Board of Education of Harford County's Amended Responses and Objections to Defendants' Interrogatories (Set 3), dated April 14, 2025.

77. Attached as **Exhibit 77** is a true and correct copy of Plaintiff Irvington Public Schools' Third Amended Answers to Defendants' Interrogatories (Set 3), dated May 14, 2025.

1 78. Attached as **Exhibit 78** is a true and correct copy of Plaintiff Tucson Unified School
2 District's Second Amended Answers to Defendants' Interrogatories (Set 3), dated May 15, 2025.

3 79. Attached as **Exhibit 79** is a true and correct copy of the May 16, 2025 Expert Report
4 of Dr. Sharon Hoover.

5 80. Attached as **Exhibit 80** is a true and correct copy of the June 20, 2025 Amended
6 Expert Report of Dr. Sharon Hoover for Breathitt County Board of Education.

7 81. Attached as **Exhibit 81** is a true and correct copy of the June 20, 2025 Amended
8 Expert Report of Dr. Sharon Hoover for Charleston County School District.

9 82. Attached as **Exhibit 82** is a true and correct copy of the June 20, 2025 Amended
10 Expert Report of Dr. Sharon Hoover for DeKalb County Schools.

11 83. Attached as **Exhibit 83** is a true and correct copy of the June 20, 2025 Amended
12 Expert Report of Dr. Sharon Hoover for Board of Education Harford County.

13 84. Attached as **Exhibit 84** is a true and correct copy of the June 20, 2025 Amended
14 Expert Report of Dr. Sharon Hoover for Irvington Public Schools.

15 85. Attached as **Exhibit 85** is a true and correct copy of the June 20, 2025 Amended
16 Expert Report of Dr. Sharon Hoover for Tucson Unified School District.

17 86. Attached as **Exhibit 86** is a true and correct copy of the July 30, 2025 Rebuttal Report
18 of Dr. Sharon Hoover.

19 87. Attached as **Exhibit 87** is a true and correct copy of the August 7, 2025 Amended
20 Rebuttal Report of Dr. Sharon Hoover for Breathitt County Board of Education.

21 88. Attached as **Exhibit 88** is a true and correct copy of the August 1, 2025 Rebuttal
22 Report of Dr. Sharon Hoover for Charleston County School District.

23 89. Attached as **Exhibit 89** is a true and correct copy of the August 7, 2025 Amended
24 Rebuttal Report of Dr. Sharon Hoover for DeKalb County School District.

25 90. Attached as **Exhibit 90** is a true and correct copy of the August 1, 2025 Rebuttal
26 Report of Dr. Sharon Hoover for Harford County Public Schools.

27 91. Attached as **Exhibit 91** is a true and correct copy of the August 7, 2025 Amended
28 Rebuttal Report of Dr. Sharon Hoover for Irvington Public Schools.

1 92. Attached as **Exhibit 92** is a true and correct copy of the August 7, 2025 Amended
2 Rebuttal Report of Dr. Sharon Hoover for Tucson Unified School District.

3 93. Attached as **Exhibit 93** is a true and correct copy of the August 12, 2025 deposition
4 transcript volume 1 of Dr. Sharon Hoover.

5 94. Attached as **Exhibit 94** is a true and correct copy of the August 13, 2025 deposition
6 transcript volume 2 of Dr. Sharon Hoover.

7 95. Attached as **Exhibit 95** is a true and correct copy of the April 8, 2025 30(b)(6)
8 deposition transcript of Julie Shivanonda.

9 96. Attached as **Exhibit 96** is a true and correct copy of the September 4, 2025 Second
10 Amended Expert Report of Dr. Douglas Leslie for Breathitt County Board of Education.

11 97. Attached as **Exhibit 97** is a true and correct copy of the September 4, 2025 Second
12 Amended Expert Report of Dr. Douglas Leslie for Charleston County School District.

13 98. Attached as **Exhibit 98** is a true and correct copy of the September 4, 2025 Second
14 Amended Expert Report of Dr. Douglas Leslie for DeKalb County School District.

15 99. Attached as **Exhibit 99** is a true and correct copy of the September 4, 2025 Second
16 Amended Expert Report of Dr. Douglas Leslie for Board of Education of Harford County.

17 100. Attached as **Exhibit 100** is a true and correct copy of the September 4, 2025 Second
18 Amended Expert Report of Dr. Douglas Leslie for Irvington Public Schools.

19 101. Attached as **Exhibit 101** is a true and correct copy of the September 4, 2025 Second
20 Amended Expert Report of Dr. Douglas Leslie for Tucson Unified School District.

21 102. Attached as **Exhibit 102** is a true and correct copy of the August 1, 2025 Rebuttal
22 Report of Dr. Douglas Leslie for Breathitt County Board of Education

23 103. Attached as **Exhibit 103** is a true and correct copy of the August 1, 2025 Rebuttal
24 Report of Dr. Douglas Leslie for Charleston County School District.

25 104. Attached as **Exhibit 104** is a true and correct copy of the August 1, 2025 Rebuttal
26 Report of Dr. Douglas Leslie for DeKalb County School District.

27 105. Attached as **Exhibit 105** is a true and correct copy of the August 1, 2025 Rebuttal
28 Report of Dr. Douglas Leslie for Board of Education of Harford County.

1 106. Attached as **Exhibit 106** is a true and correct copy of the August 1, 2025 Rebuttal
2 Report of Dr. Douglas Leslie for Irvington Public Schools.

3 107. Attached as **Exhibit 107** is a true and correct copy of the August 1, 2025 Rebuttal
4 Report of Dr. Douglas Leslie for Tucson Unified School District.

5 108. Attached as **Exhibit 108** is a true and correct copy of the September 11, 2025
6 Amended Expert Report of Brian Osborne.

7 109. Attached as **Exhibit 109** is a true and correct copy of the September 11, 2025
8 Amended Expert Rebuttal report of Brian Osborne.

9 110. Attached as **Exhibit 110** is a true and correct copy of the September 4, 2025
10 deposition transcript of Brian Osborne.

11 111. Attached as **Exhibit 111** is a true and correct copy of Brian Osborne's curriculum
12 vitae, marked as Exhibit 1 at the September 4, 2025 deposition of Brian Osborne.

13 112. Attached as **Exhibit 112** is a true and correct copy of the article *Social media use*
14 *associated with depression among US young adults* (2016) authored by the University of Pittsburgh
15 Schools of the Health Sciences, marked as Exhibit 19 at the September 4, 2025 deposition of Brian
16 Osborne.

17 113. Attached as **Exhibit 113** is a true and correct copy of the article *How Money Matters*
18 *for Schools* (2017) authored by Bruce D. Baker, marked as Exhibit 20 at the September 4, 2025
19 deposition of Brian Osborne.

20 114. Attached as **Exhibit 114** is a true and correct copy of Plaintiff Charleston County
21 School District's Supplemental Answers to Defendants' Interrogatories (Set 3), dated April 23,
22 2025.

23 115. Attached as **Exhibit 115** is a true and correct copy of Plaintiff DeKalb County School
24 District's Amended Objections and Responses to Defendants' Interrogatories (Set 3), dated March
25 24, 2025.

26 116. Attached as **Exhibit 116** is a true and correct copy of Jeffrey Meyer deposition errata
27 sheet, dated October 9, 2025.

1 I declare under penalty of perjury, under the laws of the United States that the foregoing is
2 true and accurate. This declaration was executed on November 7, 2025, in Radnor, Pennsylvania.

3
4 Dated: November 7, 2025

/s/ Melissa L. Yeates

Melissa L. Yeates